## Pages: 3

## IN THE SUPREME COURT OF MISSISSIPPI

## NO. 2014-TS-01696-SCT

WELLNESS INC., d/b/a WELLNESS ENVIRONMENTS

**APPELLANT** 

VS.

PEARL RIVER COUNTY HOSPITAL

APPELLEE

# MOTION FOR LEAVE TO FILE APPELLANT'S REPLY TO PEARL RIVER COUNTY HOSPITAL'S RESPONSE TO APPELLANT'S MOTION TO POSTPONE ORAL ARGUMENT

COMES NOW, the Appellant, Wellness Inc., d/b/a Wellness Environments, by and through counsel, and files this its Motion for Leave to File Appellant's Reply to Pearl River County Hospital's Response to Appellant's Motion to Postpone Oral Argument, and for cause would show unto the Court the following:

- 1. Appellant filed its Motion to Postpone Oral Argument on August 19, 2015.
- 2. Appellee, Pearl River County Hospital, filed its response to Appellant's Motion on August 20, 2015.
- 3. A reply is necessary to fairly address the inaccuracies present in Appellee's response, for which if no reply is permitted, paints an inaccurate picture of the proceedings in the federal court leading up to Appellant's request to postpone the oral argument.
- 4. Appellant's Proposed Reply is attached hereto as Exhibit "A."

WHEREFORE, Appellant requests that the Court grant its Motion for Leave to File Appellant's Reply to Pearl River County Hospital's Response to Appellant's Motion to

Postpone Oral Argument and accept for filing the Proposed Reply attached hereto as Exhibit "A," and for all other relief it may be entitled.

## **RESPECTFULLY SUBMITTED**, this the <u>20<sup>th</sup></u> day of August, 2015.

## WELLNESS INC., d/b/a WELLNESS ENVIRONMENTS

By: /s/ Stephen D. Stamboulieh

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ATTORNEYS FOR APPELLANT

## **CERTIFICATE OF SERVICE**

I hereby certify that on this day I electronically filed the foregoing document with the Clerk of the Supreme Court using the MEC system which sent notification of such filing to the following and mailed by United States Postal Service, postage prepaid, as appropriate, to non-MEC filers:

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THIS the 20th day of August, 2015.

/s/ Stephen D. Stamboulieh